

MSE:

AO 91 (Rev. 11/11) Criminal Complaint

2020R00251

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No. 20-mj-365 HB

(1) MCKENZY ANN DEGIDIO DUNN
(2) BAILEY MARIE BALDUS

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 28, 2020, in St. Paul, in the State and District of Minnesota, the defendants MCKENZY ANN DEGIDIO DUNN and BAILEY MARIE BALDUS conspired with Samuel Elliott Frey and Co-Conspirator CF to commit arson on property used in interstate commerce, in violation of Title 18, United States Code, 844(i), all in violation of Title 18, United States Code, Section 371.

I further state that I am an ATF Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

SUBSCRIBED and SWORN before me
by reliable electronic means (FaceTime and email)
pursuant to Fed. R. Crim. P. 41(d)(3).


Complainant's signature

Laura Gulick, ATF Special Agent
Printed name and title

Date: June 8, 2020

City and State: St. Paul, MN


Judge's Signature

The Honorable Hildy Bowbeer
United States Magistrate Judge
Printed Name and Title